

Fill in this information to identify the case:

Debtor 1 George H. Gruber

Debtor 2
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PACase number 17-05295 HWV**Form 4100R****Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: Laelia LLC

Court claim no. (if known): 13

Last 4 digits of any number you use to identify the debtor's account: 3972

Property address:

7018 Brookdale Drive
Harrisburg, PA 17111**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____**Part 3: Postpetition Mortgage Payment**

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:	(a)	\$ <u>52,349.44</u>
b. Total fees, charges, expenses, escrow, and costs outstanding:	+ (b)	\$ <u>0.00</u>
c. Total. Add lines a and b.	(c)	\$ <u>52,349.44</u>

Creditor asserts that the debtor(s) are contractually obligated for 03 / 01 / 2023
the postpetition payment(s) that first became due on:

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ **Stephanie A. Walczak**

Date **04/15/2025**

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: George H. Gruber Jr. aka George
H Gruber**

Debtor(s)

Laelia LLC

Movant

vs.

**George H. Gruber Jr. aka George H
Gruber**

Debtor(s)

Jack N Zaharopoulos,

Trustee

BK NO. 17-05295 HWV

Chapter 13

**Related to Claim No.
13**

CERTIFICATE OF SERVICE

RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT

I, Stephanie A. Walczak, of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on April 15, 2025, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below;

Debtor(s)

George H. Gruber Jr. aka George H Gruber
7018 Brookdale Drive
Harrisburg, PA 17111

Attorney for Debtor(s) (via ECF)

Robert E Chernicoff,
Cunningham and Chernicoff PC
2320 North Second Street
Harrisburg, PA 17110

Trustee (via ECF)

Jack N Zaharopoulos
Standing Chapter 13
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail

Dated: April 15, 2025

/s/ Stephanie A. Walczak

Stephanie A. Walczak Esquire
Attorney I.D. 320431
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
201-549-2363
bkgroup@kmlawgroup.com

Post-Petition Payment History
Case# 17-05295

Date	Amount Due	Amount RCVD POST	Amount Applied POST	Balance Due POST	PMT Applied POST	Suspense Balance POST
12/29/17	BK Filed					\$0.00
1/1/18	\$1,205.55			\$1,205.55		\$0.00
2/1/18	\$1,205.55			\$2,411.10		\$0.00
3/1/18	\$1,205.55			\$3,616.65		\$0.00
4/1/18	\$1,205.55			\$4,822.20		\$0.00
5/1/18	\$1,205.55			\$6,027.75		\$0.00
6/1/18	\$1,205.55			\$7,233.30		\$0.00
7/1/18	\$1,205.55			\$8,438.85		\$0.00
7/16/18	MFR Filed			\$8,438.85		\$0.00
8/1/18	\$1,205.55			\$9,644.40		\$0.00
8/1/18		\$6,027.75	\$1,205.55	\$8,438.85	1/1/18	\$4,822.20
8/1/18			\$1,205.55	\$7,233.30	2/1/18	\$3,616.65
8/1/18			\$1,205.55	\$6,027.75	3/1/18	\$2,411.10
8/1/18			\$1,205.55	\$4,822.20	4/1/18	\$1,205.55
8/1/18			\$1,205.55	\$3,616.65	5/1/18	\$0.00
9/1/18	\$1,205.55			\$4,822.20		\$0.00
9/7/18		\$3,617.00	\$1,205.55	\$3,616.65	6/1/18	\$2,411.45
9/7/18			\$1,205.55	\$2,411.10	7/1/18	\$1,205.90
9/7/18			\$1,205.55	\$1,205.55	8/1/18	\$0.35
9/24/18	Stipulation Entered			\$1,205.55		\$0.35
10/1/18	\$1,205.55			\$2,411.10		\$0.35
10/12/18		\$1,205.55	\$1,205.55	\$1,205.55	9/1/18	\$0.35
10/12/18	10/1/18 Stip Pymt	\$201.45		\$1,205.55		\$201.80
11/1/18	\$1,205.55			\$2,411.10		\$201.80
11/15/18		\$1,205.55	\$1,205.55	\$1,205.55	10/1/18	\$201.80
11/15/18	11/1/18 Stip Pymt	\$202.45		\$1,205.55		\$404.25
12/1/18	\$1,205.55			\$2,411.10		\$404.25
12/27/18		\$1,205.55	\$1,205.55	\$1,205.55	11/1/18	\$404.25
12/27/18	12/1/18 Stip Pymt	\$201.45		\$1,205.55		\$605.70
1/1/19	\$1,205.55			\$2,411.10		\$605.70
1/25/19		\$1,205.55	\$1,205.55	\$1,205.55	12/1/18	\$605.70
1/25/19	1/1/19 Stip Pymt	\$201.45		\$1,205.55		\$807.15
2/1/19	\$1,205.55			\$2,411.10		\$807.15
2/26/19		\$1,205.55	\$1,205.55	\$1,205.55	1/1/19	\$807.15
2/26/19	2/1/19 Stip Pymt	\$201.45		\$1,205.55		\$1,008.60
3/1/19	\$1,205.55			\$2,411.10		\$1,008.60
3/28/19		\$1,205.55	\$1,205.55	\$1,205.55	2/1/19	\$1,008.60
3/28/19	3/1/19 Stip Pymt	\$201.45		\$1,205.55		\$1,210.05
3/28/19			\$1,205.55	\$0.00	3/1/19	\$4.50
4/1/19	\$1,205.55			\$1,205.55		\$4.50
4/1/19		\$1,205.55	\$1,205.55	\$0.00	4/1/19	\$4.50
4/2/19	NSF	(\$1,205.55)	(\$1,205.55)	\$1,205.55	(4/1/19)	\$4.50
4/2/19	NSF 3/1/19 Stip Pymt	(\$201.45)		\$1,205.55		(\$196.95)
4/2/19			(\$1,205.55)	\$2,411.10	(3/1/19)	\$1,008.60
4/26/19		\$1,603.46	\$1,205.55	\$1,205.55	3/1/19	\$1,406.51

Post-Petition Payment History
Case# 17-05295

Date	Amount Due	Amount RCVD POST	Amount Applied POST	Balance Due POST	PMT Applied POST	Suspense Balance POST
4/26/19			\$1,205.55	\$0.00	4/1/19	\$200.96
4/29/19		\$1,205.55	\$1,205.55	(\$1,205.55)	5/1/19	\$200.96
5/1/19	\$1,205.55			\$0.00		\$200.96
5/1/19	NSF	(\$1,603.46)	(\$1,205.55)	\$1,205.55	(5/1/19)	(\$196.95)
5/1/19	NSF		(\$1,205.55)	\$2,411.10	(4/1/19)	\$1,008.60
6/1/19	\$1,205.55			\$3,616.65		\$1,008.60
6/28/19		\$1,205.55	\$1,205.55	\$2,411.10	4/1/19	\$1,008.60
7/1/19	\$1,205.55			\$3,616.65		\$1,008.60
8/1/19	\$1,205.55			\$4,822.20		\$1,008.60
8/1/19		\$2,411.10	\$1,205.55	\$3,616.65	5/1/19	\$2,214.15
8/1/19			\$1,205.55	\$2,411.10	6/1/19	\$1,008.60
8/26/19		\$1,382.07	\$1,205.55	\$1,205.55	7/1/19	\$1,185.12
9/1/19	\$1,205.55			\$2,411.10		\$1,185.12
9/26/19		\$1,205.55	\$1,205.55	\$1,205.55	8/1/19	\$1,185.12
10/1/19	\$1,205.55			\$2,411.10		\$1,185.12
11/1/19	\$1,205.55			\$3,616.65		\$1,185.12
11/18/19		\$1,205.55	\$1,205.55	\$2,411.10	9/1/19	\$1,185.12
11/26/19	NSF	(\$1,205.55)	(\$1,205.55)	\$3,616.65	(9/1/19)	\$1,185.12
11/27/19		\$1,205.55	\$1,205.55	\$2,411.10	9/1/19	\$1,185.12
12/1/19	\$1,205.55			\$3,616.65		\$1,185.12
12/27/19		\$1,205.55	\$1,205.55	\$2,411.10	10/1/19	\$1,185.12
1/1/20	\$1,205.55			\$3,616.65		\$1,185.12
1/30/20		\$1,205.55	\$1,205.55	\$2,411.10	11/1/19	\$1,185.12
2/1/20	\$1,205.55			\$3,616.65		\$1,185.12
2/28/20		\$1,205.55	\$1,205.55	\$2,411.10	12/1/19	\$1,185.12
3/1/20	\$1,205.55			\$3,616.65		\$1,185.12
3/31/20		\$1,205.55	\$1,205.55	\$2,411.10	1/1/20	\$1,185.12
4/1/20	\$1,205.55			\$3,616.65		\$1,185.12
4/30/20		\$1,205.55	\$1,205.55	\$2,411.10	2/1/20	\$1,185.12
5/1/20	\$1,205.55			\$3,616.65		\$1,185.12
5/28/20		\$1,205.55	\$1,205.55	\$2,411.10	3/1/20	\$1,185.12
6/1/20	\$1,205.55			\$3,616.65		\$1,185.12
6/22/20	MFR #2 Filed			\$3,616.65		\$1,185.12
7/1/20	\$1,205.55			\$4,822.20		\$1,185.12
7/14/20	Order Granting Limited Relief			\$4,822.20		\$1,185.12
8/1/20	\$1,205.55			\$6,027.75		\$1,185.12
8/1/20	Forebearance Adjustment Mar-Aug 2020		\$6,027.75	\$0.00		\$1,185.12
9/1/20	\$1,205.55			\$1,205.55		\$1,185.12
10/1/20	\$1,205.55			\$2,411.10		\$1,185.12
11/1/20	\$1,205.55			\$3,616.65		\$1,185.12
12/1/20	\$1,205.55			\$4,822.20		\$1,185.12
1/1/21	\$1,205.55			\$6,027.75		\$1,185.12
2/1/21	\$1,205.55			\$7,233.30		\$1,185.12
3/1/21	\$1,205.55			\$8,438.85		\$1,185.12
4/1/21	\$1,205.55			\$9,644.40		\$1,185.12

Post-Petition Payment History
Case# 17-05295

Date	Amount Due	Amount RCVD POST	Amount Applied POST	Balance Due POST	PMT Applied POST	Suspense Balance POST
4/14/21	Motion to Modify Plan			\$9,644.40		\$1,185.12
4/14/21	\$13,822.20 To be paid through plan		\$9,644.40	\$0.00		\$0.00
5/1/21	\$1,205.55			\$1,205.55		\$0.00
5/11/21	Order Granting Amended Motion To Modify Plan			\$1,205.55		\$0.00
6/1/21	\$1,205.55			\$2,411.10		\$0.00
6/2/21		\$1,205.55	\$1,205.55	\$1,205.55	5/1/21	\$0.00
6/24/21		\$1,500.00	\$1,205.55	\$0.00	6/1/21	\$294.45
6/24/21				\$0.00		\$294.45
6/30/21		\$1,205.55	\$1,205.55	(\$1,205.55)	7/1/21	\$294.45
7/1/21	\$1,205.55			\$0.00		\$294.45
8/1/21	\$1,372.99			\$1,372.99		\$294.45
8/26/21		\$1,891.49	\$1,372.99	\$0.00	8/1/21	\$812.95
9/1/21	\$1,372.99			\$1,372.99		\$812.95
9/30/21		\$1,372.99	\$1,372.99	\$0.00	9/1/21	\$812.95
10/1/21	\$1,970.92			\$1,970.92		\$812.95
11/1/21	\$1,970.92			\$3,941.84		\$812.95
11/4/21		\$1,970.92	\$1,970.92	\$1,970.92	10/1/21	\$812.95
11/4/21				\$1,970.92		\$812.95
12/1/21	\$1,970.92			\$3,941.84		\$812.95
12/22/21		\$1,970.92	\$1,970.92	\$1,970.92	11/1/21	\$812.95
12/27/21	NSF	(\$1,970.92)	(\$1,970.92)	\$3,941.84	(11/1/21)	\$812.95
1/1/22	\$1,970.92			\$5,912.76		\$812.95
1/21/22		\$2,032.69	\$1,970.92	\$3,941.84	11/1/21	\$874.72
1/26/22	NSF	(\$2,032.69)	(\$1,970.92)	\$5,912.76	(11/1/21)	\$812.95
2/1/22	\$2,032.69			\$7,945.45		\$812.95
3/1/22	\$2,032.69			\$9,978.14		\$812.95
4/1/22	\$2,032.69			\$12,010.83		\$812.95
5/1/22	\$2,032.69			\$14,043.52		\$812.95
6/1/22	\$2,013.44			\$16,056.96		\$812.95
6/10/22	Stipulation Entered			\$16,056.96		\$812.95
6/13/22	ORDER Granting Stipulation			\$16,056.96		\$812.95
6/13/22	\$16,677.89 To be paid through plan by APOC		\$16,056.96	\$0.00		\$0.00
6/15/22		\$2,013.44	\$2,013.44	(\$2,013.44)	7/1/22	\$0.00
6/17/22	Motion to Modify Plan			(\$2,013.44)		\$0.00
7/1/22	\$2,013.44			\$0.00		\$0.00
7/12/22	Order Granting Motion To Modify Plan			\$0.00		\$0.00
8/1/22	\$2,013.44			\$2,013.44		\$0.00
8/16/22		\$2,013.44	\$2,013.44	\$0.00	8/1/22	\$0.00
9/1/22	\$2,013.44			\$2,013.44		\$0.00
9/20/22		\$2,013.44	\$2,013.44	\$0.00	9/1/22	\$0.00
10/1/22	\$2,013.44			\$2,013.44		\$0.00
10/18/22		\$2,013.44	\$2,013.44	\$0.00	10/1/22	\$0.00
10/19/22	APOC Filed for \$21,653.15			\$0.00		\$0.00
11/1/22	\$2,013.44			\$2,013.44		\$0.00
11/15/22		\$2,013.44	\$2,013.44	\$0.00	11/1/22	\$0.00

Post-Petition Payment History
Case# 17-05295

Date	Amount Due	Amount RCVD POST	Amount Applied POST	Balance Due POST	PMT Applied POST	Suspense Balance POST
12/1/22	\$2,013.44			\$2,013.44		\$0.00
12/22/22		\$2,013.44	\$2,013.44	\$0.00	12/1/22	\$0.00
1/1/23	\$2,013.44			\$2,013.44		\$0.00
2/1/23	\$2,013.44			\$4,026.88		\$0.00
2/6/23		\$2,013.44	\$2,013.44	\$2,013.44	1/1/23	\$0.00
2/9/23	Payment Stopped	(\$2,013.44)	(\$2,013.44)	\$4,026.88	(1/1/23)	\$0.00
2/22/23		\$2,013.44	\$2,013.44	\$2,013.44	1/1/23	\$0.00
3/1/23	\$2,013.44			\$4,026.88		\$0.00
4/1/23	\$2,013.44			\$6,040.32		\$0.00
5/1/23	\$2,013.44			\$8,053.76		\$0.00
5/22/23		\$2,013.44	\$2,013.44	\$6,040.32	2/1/23	\$0.00
6/1/23	\$2,013.44			\$8,053.76		\$0.00
6/27/23		\$2,032.69	\$2,013.44	\$6,040.32	3/1/23	\$19.25
6/30/23	NSF	(\$2,032.69)	(\$2,013.44)	\$8,053.76	(3/1/23)	\$0.00
7/1/23	\$2,013.44			\$10,067.20		\$0.00
7/25/23		\$2,013.44	\$2,013.44	\$8,053.76	3/1/23	\$0.00
7/28/23	NSF	(\$2,013.44)	(\$2,013.44)	\$10,067.20	(3/1/23)	\$0.00
8/1/23	\$2,013.44			\$12,080.64		\$0.00
9/1/23	\$2,013.44			\$14,094.08		\$0.00
10/1/23	\$2,013.44			\$16,107.52		\$0.00
11/1/23	\$2,013.44			\$18,120.96		\$0.00
12/1/23	\$2,013.44			\$20,134.40		\$0.00
1/1/24	\$2,013.44			\$22,147.84		\$0.00
2/1/24	\$2,013.44			\$24,161.28		\$0.00
3/1/24	\$2,013.44			\$26,174.72		\$0.00
4/1/24	\$2,013.44			\$28,188.16		\$0.00
5/1/24	\$2,013.44			\$30,201.60		\$0.00
6/1/24	\$2,013.44			\$32,215.04		\$0.00
7/1/24	\$2,013.44			\$34,228.48		\$0.00
8/1/24	\$2,013.44			\$36,241.92		\$0.00
9/1/24	\$2,013.44			\$38,255.36		\$0.00
10/1/24	\$2,013.44			\$40,268.80		\$0.00
11/1/24	\$2,013.44			\$42,282.24		\$0.00
12/1/24	\$2,013.44			\$44,295.68		\$0.00
1/1/25	\$2,013.44			\$46,309.12		\$0.00
2/1/25	\$2,013.44			\$48,322.56		\$0.00
3/1/25	\$2,013.44			\$50,336.00		\$0.00
4/1/25	\$2,013.44			\$52,349.44		\$0.00

Payments Due 3/1/23 Through 4/1/25: \$52,349.44

Less Suspense: \$0.00

Total: \$52,349.44